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8 Attorneys for Defendants
The Walt Disney Company, et al.

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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 ESPLANADE PRODUCTIONS, INC., a
13 Delaware corporation,

14 Plaintiff,

15 v.

16 THE WALT DISNEY COMPANY, a
Delaware corporation; DISNEY
17 ENTERPRISES, INC., a Delaware
corporation; WALT DISNEY PICTURES,
18 a California corporation; ABC, INC., a
New York corporation; BUENA VISTA
HOME ENTERTAINMENT, INC., a
19 California corporation; DISNEY
CONSUMER PRODUCTS, INC., a
20 California corporation; DISNEY
CONSUMER PRODUCTS AND
21 INTERACTIVE MEDIA, INC., a
California corporation; DISNEY BOOK
22 GROUP, LLC, a Delaware limited liability
company; BUENA VISTA BOOKS, INC.,
23 a California corporation; DISNEY
INTERACTIVE STUDIOS, INC., a
24 California corporation; DISNEY STORE
USA, LLC, a Delaware limited liability
25 company; DISNEY SHOPPING, INC., a
Delaware corporation; and DOES 1
26 through 10, inclusive,

27 Defendants.
28

Case No. 2:17-cv-02185-MWF-JC

**DECLARATION OF CRAIG P.
BLOOM IN SUPPORT OF
DEFENDANTS' MOTION TO
DISMISS PLAINTIFF'S
COMPLAINT**

Hearing Date: June 26, 2017

Hearing Time: 10:00 a.m.

Place: Courtroom 5A

Judge: Hon. Michael W. Fitzgerald

DECLARATION OF CRAIG P. BLOOM

I, Craig P. Bloom, do hereby declare:

1. I am an attorney at law, licensed to practice in the State of California. I am an associate at O'Melveny & Myers LLP, counsel of record for Defendants The Walt Disney Company, Disney Enterprises, Inc., Walt Disney Pictures, ABC, Inc., Buena Vista Home Entertainment, Inc., Disney Consumer Products, Inc., Disney Consumer Products and Interactive Media, Inc., Disney Book Group, LLC, Buena Vista Books, Inc., Disney Interactive Studios, Inc., Disney Store USA, LLC, and Disney Shopping, Inc., (collectively, "Defendants"). I make this declaration in support of Defendants' Motion To Dismiss Plaintiff's Complaint. I have personal knowledge of the facts set forth below.

Meet-and-Confer Efforts

2. On April 12, 2017, pursuant to Local Rule 7-3, I sent an email to Plaintiff's counsel, Gary E. Gans, attaching a meet-and-confer letter from my colleague Daniel M. Petrocelli.

3. On April 19, 2017, my colleague James M. Pearl and I met and conferred telephonically with Mr. Gans to discuss our clients' respective positions concerning this lawsuit, and specifically Defendants' Motion to Dismiss Plaintiff's Complaint. The parties addressed during the meet and confer the content of Mr. Petrocelli's April 12, 2017 letter and their respective arguments. Plaintiff declined to dismiss or amend its complaint to address the issues we raised in our Local Rule 7-3 discussions.

Other Exhibits

4. Attached and lodged with the Court as Exhibit A is a true and correct copy of the DVD of the Defendants' motion picture *Zootopia*.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct, and that this declaration was executed this 22nd day of May 2017 at Los Angeles, California.

A handwritten signature in black ink, appearing to read 'C. P. Bloom', written over a horizontal line.

Craig P. Bloom

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